

A. Alexander Hamalian OSB #960684

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

)	No. CR 00268-MO
10 UNITED STATES OF AMERICA,)	
)	
11 Plaintiff,)	DECLARATION IN SUPPORT OF
)	OPPOSED MOTION TO CONTINUE
12 vs.)	TRIAL DATE
)	
13 KEVIN HESTER,)	
)	
14 Defendant.)	
)	

I, A. Alexander Hamalian, declare the following to be true
to the best of my knowledge:

1. On October 20, 2020 I was retained by the Defendant, Kevin Hester in this prosecution, pursuant to the Criminal Justice Act, 18 USC 3006A by Order of the Honorable Michael W. Mosman;
2. I make this Declaration in support of the attached Unopposed Motion to Continue trial date;
3. Mr. Kevin Hester is charged with two counts of Possession with Intent to Distribute Methamphetamine.
4. Kevin Hester needs to complete treatment.

Page 1 - DEFENDANT'S DECLARATION FOR MOTION TO CONTINUE

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- 1 5. A continuance of the current trial date for approximately 120
2 days is necessary to provide the defense with adequate time
3 to complete discovery review; to conduct independent
4 investigation, continue ongoing negotiations that would
5 produce an outcome outside of trial ; and/or to prepare for
6 trial; and to otherwise complete preparations for Mr. Kevin
7 Hesters defense;
8 6. This is the Second motion to reset the trial date filed in
9 this case on behalf of current counsel;
10 7. I have contacted AUSA Byron Chatfield and on behalf of the
11 government he does not oppose this requested continuance;
12 8. I declare that the above statements are true to the best of
13 my knowledge and belief, and that I understand they are made
14 for use as evidence in court and are subject to penalty for
15 perjury, in accordance with ORCP 1E.

16 Respectfully Submitted;

17 LAW OFFICE OF A. ALEXANDER HAMALIAN

18 Date: 3/12/21

19 A. Alexander Hamalian, OSB #960684
20 Attorney for Defendant
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